

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION**

GEORGE BONDS,)
Plaintiff,)
v.) Case No. 2:17-cv-02141-JPM-dkv
PROGRESSIVE LEASING, LLC,)
Defendant.)

**DEFENDANT PROGRESSIVE LEASING, LLC'S UNOPPOSED MOTION FOR
EXTENSION OF TIME TO RESPOND TO THE COMPLAINT**

Pursuant to Federal Rule of Civil Procedure 6(b), Defendant Progressive Leasing, LLC (“PL”) moves for an extension of time to respond to Plaintiff’s Complaint, up to and including April 3, 2017. PL’s response to Plaintiff’s Complaint is currently due on or about March 23, 2017. PL requests an approximately ten-day extension of time, up to and including Monday, April 3, 2017, so that it can further investigate the allegations in the Complaint and prepare its response.

PL is not seeking this extension to unduly delay this case or for any other improper purpose. Because no scheduling order has issued, this extension of time will not alter this case’s trial date or any other deadlines. Additionally, counsel for Plaintiff has indicated that he has no objection to this extension. Accordingly, PL requests that its deadline to respond to Plaintiff’s Complaint be extended up to and including April 3, 2017.

Respectfully submitted,

OGLETREE, DEAKINS, NASH,
SMOAK & STEWART, P.C.

s/Audrey M. Calkins

Audrey M. Calkins (TN BPR No. 30093)
6410 Poplar Avenue, Suite 300
Memphis, TN 38119
Telephone: (901) 767-6160
Facsimile: (901) 767-7411
audrey.calkins@odnss.com

COUNSEL FOR DEFENDANT
PROGRESSIVE LEASING, LLC

CERTIFICATE OF CONSULTATION

I hereby certify that I conferred with counsel for Plaintiff by email regarding this Motion on March 23, 2017, and he has indicated that he will not oppose the Motion.

s/Audrey M. Calkins

CERTIFICATE OF SERVICE

I hereby certify that on the 23rd day of March, 2017, the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon the following.

Alex Simanovsky
Alex Simanovsky & Associates, LLC
2300 Henderson Mill Road # 300
Atlanta, GA 30345
Telephone: 678-781-1012
alex@a-s-law.com

s/Audrey M. Calkins